

EXHIBIT G

From: McGonagle, Dan
Sent: Thursday, May 13, 2021 11:48 PM
To: 'Deeva V. Shah'; Singular
Cc: abhansali@kblfirm.com; mkwun@kblfirm.com; wgs-singularv.google@wolfgreenfield.com; nhueston@kblfirm.com; kvpsingular@keker.com
Subject: RE: Singular Computing LLC v. Google LLC; Case No. 1:19-cv-12551 FDS | Discovery Service

Deeva,
Your refusal to answer interrogatories based on the sufficiency of our damages disclosures is not proper. Disclosing damages amounts and the manner in which those amounts were calculated requires too detailed of an analysis and explanation for an interrogatory response. Our disclosures and responses to interrogatories were more than sufficient and do not serve as a basis to refuse to answer basic interrogatories.

Regardless, we have provided you with our damages theories supplemented with as much detail as your production and discovery responses will allow.

We intend to move the Court and indicate that your refused to conduct a meet and confer regarding this issue.

Thanks,
Dan

From: Deeva V. Shah [mailto:dshah@keker.com]
Sent: Thursday, May 13, 2021 10:42 PM
To: McGonagle, Dan <DMcGonagle@princetonobel.com>; Singular <Singular@princetonobel.com>
Cc: abhansali@kblfirm.com; mkwun@kblfirm.com; wgs-singularv.google@wolfgreenfield.com; nhueston@kblfirm.com; kvpsingular@keker.com
Subject: RE: Singular Computing LLC v. Google LLC; Case No. 1:19-cv-12551 FDS | Discovery Service

Dan,

We are reviewing the supplemental response to Interrogatory No. 5, which Singular served after your email on this matter. As explained in our previous email, we can provide times to meet and confer once we complete that review. Please let us know whether Singular also intends to supplement its initial disclosures. As for the call tomorrow, I will be out of the office and unable to join.

Regards,
Deeva

From: McGonagle, Dan <dmcgonagle@princetonobel.com>
Sent: Thursday, May 13, 2021 8:53 AM
To: Deeva V. Shah <DShah@keker.com>; singular@princetonobel.com
Cc: abhansali@kblfirm.com; mkwun@kblfirm.com; wgs-singularv.google@wolfgreenfield.com; nhueston@kblfirm.com; kvpsingular@keker.com
Subject: RE: Singular Computing LLC v. Google LLC; Case No. 1:19-cv-12551 FDS | Discovery Service

[EXTERNAL]

Deeva,

Google's refusal to meet and confer is improper. Please be prepared to discuss Google's deficient damages-related document production and Google's failure to respond to Singular's Third Set of Interrogatories at the meet and confer scheduled for tomorrow.

Thanks,
Dan McGonagle



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One International Place, Suite 3700
Boston, Massachusetts 02110

617.456.8081 Direct
dmcgonagle@princelobel.com



From: Deeva V. Shah [<mailto:dshah@keker.com>]
Sent: Wednesday, May 12, 2021 3:03 PM
To: McGonagle, Dan <DMcGonagle@princelobel.com>; Singular <Singular@princelobel.com>
Cc: abhansali@kblfirm.com; mkwun@kblfirm.com; wgs-singularv.google@wolfgreenfield.com; nhueston@kblfirm.com; kvsingular@keker.com
Subject: RE: Singular Computing LLC v. Google LLC; Case No. 1:19-cv-12551 FDS | Discovery Service

Counsel,

Thanks for your email. We are happy to meet and confer about Google's responses to Singular's Third Set of Interrogatories, which seek information related to Singular's damages claim. However, as I explained in my May 4, 2021 letter, Singular has to date failed to make any meaningful disclosures about its damages theories or the fact underpinning them. In my May 4 letter, we asked Singular to supplement its initial disclosures and response to Interrogatory No. 5 to provide that information. Even though we asked Singular to provide those supplemental disclosures by May 11 (yesterday), we have yet to receive any response at all to my letter.

Singular's failure to provide adequate disclosures about its damages claim is improper, and we believe it must be remedied before the parties can have a productive meet and confer over damages issues, including the discovery requested in Singular's Third Set of Interrogatories. Accordingly, we believe a meet and confer over Google's responses to those requests is premature, and we propose that the parties schedule that meet and confer to occur after Google has received and reviewed Singular's supplemental disclosures and response to Interrogatory No. 5. Please let us know when you plan to supplement Singular's disclosures and interrogatory response, and we will propose times that we are available to meet and confer following our receipt of the same.

Regards,
Deeva

Deeva Shah
757-553-8301

From: McGonagle, Dan <dmcgonagle@princelobel.com>
Sent: Tuesday, May 11, 2021 4:07 PM

To: Alisa Thompson <Althompson@keker.com>; singular@princelobel.com

Cc: abhansali@kblfirm.com; mkwun@kblfirm.com; wgs-singularv.google@wolfgreenfield.com; nhueston@kblfirm.com; kvp-singular <kvp-singular@keker.com>

Subject: RE: Singular Computing LLC v. Google LLC; Case No. 1:19-cv-12551 FDS | Discovery Service

[EXTERNAL]

Counsel,

Please provide some times that you are available for a meet and confer regarding your responses.

Thanks,

Dan

From: Alisa Thompson [<mailto:althompson@keker.com>]

Sent: Friday, May 7, 2021 6:31 PM

To: Singular <Singular@princelobel.com>

Cc: abhansali@kblfirm.com; mkwun@kblfirm.com; wgs-singularv.google@wolfgreenfield.com; nhueston@kblfirm.com; kvp-singular@keker.com

Subject: Singular Computing LLC v. Google LLC; Case No. 1:19-cv-12551 FDS | Discovery Service

Dear Counsel:

Attached please find:

- DEFENDANT'S RESPONSE AND OBJECTION TO PLAINTIFF'S THIRD SET OF INTERROGATORIES (NO. 12-20)

Regards,

Alisa Thompson

Legal Secretary

Keker, Van Nest & Peters LLP

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